

## **EXHIBIT I**



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February 6, 2009

**By Email**

James A. Pardo  
McDermott Will & Emery LLP  
340 Madison Avenue  
New York, New York 10173-1922

Re: *City of New York v. Amerada Hess, et al., 04 CV 3417 (SDNY)*  
*In re Methyl Tertiary Butyl Ether (MTBE) Products Liability Litigation,*  
MDL No. 1358, Master File No. 1:00-1898 (SAS)

Dear Mr. Pardo:

In accordance with the Court's direction at the December 11, 2008 status conference, the City of New York identifies the following City employees who may provide opinion and/or expert testimony at trial and the topics on which they may give such testimony. The City reserves the right to modify the identified topics and to identify additional current and former City employees who may provide opinion and/or expert testimony at trial in response to opinions or testimony offered by defendants.

<u>Name</u>	<u>Topic</u>
James Roberts	The future use of the City's groundwater system; the quality of water supplied to City consumers; the importance of community outreach and maintaining public confidence
Stephen Schindler	The quality of water supplied to City consumers
Ian Hurley	Analysis of water quality samples from the City wells and distribution system

Daniel Walsh

Investigation and remediation of petroleum spills  
in the City, including spills with MTBE

Nothing herein limits the City's right to identify these and other current and former City employees as percipient witnesses for trial in accordance with the schedule agreed upon by the parties.

Very truly yours,

*Amanda E. Amron for SEA*

Susan E. Amron  
Deputy Chief  
Environmental Law Division

c: All counsel (by LNFS)